

MEMO ENDORSED



TWERSKY PLLC

May 15, 2024

Via ECF

Hon. Edgardo Ramos, U.S.D.J.
Southern District of New York
40 Foley Square, Room 619
New York, New York 10007

Plaintiff is directed to submit his Opposition papers by May 20, 2024 or else the Motion to Dismiss, Doc. 25, will be deemed fully briefed. SO ORDERED.



Edgardo Ramos, U.S.D.J.

Dated: 05/16/2024

New York, New York

**Re: Todd Goldman v. Eli Weisman
Case No.: 1:23-cv-09602**

Dear Judge Ramos,

I am an attorney with the law firm of Twersky PLLC, counsel for Defendant Eli Weisman ("Weisman" or "Defendant") in the captioned matter. I respectfully submit this letter to inform the Court that ***Defendant's Motion to Dismiss the Complaint ("Motion") (D.E. 25 – D.E. 25-5) is unopposed, as Plaintiff has not filed an Opposition by the Court ordered deadline.*** For this reason, the Motion is unopposed, fully submitted and should be granted.

As the Court is aware, Plaintiff Todd Goldman ("Plaintiff") has consistently ignored this Court's schedules and orders. Plaintiff missed the Court ordered deadlines to file his Second Amended Complaint on February 20, 2024, March 7, 2024 and March 18, 2024. *See* D.E. 14; D.E. 17; D.E. 20. ***Now, again, the Plaintiff has missed a crucial Court ordered deadline.*** *See* D.E. 24. Since Plaintiff has failed to oppose, the Motion is fully submitted and should be granted. It should also be noted that Plaintiff has another frivolous lawsuit against Defendant in the Southern District of New York, captioned *Todd Goldman v. Eli Weisman, Roy Revivo, Quality Art Auctions, Inc., and Noah Weisman*, Case No. 1:23-cv-07052. Similarly, in that case, Plaintiff also failed to oppose a motion to dismiss. Clearly, Plaintiff has brought these meritless cases to harass Defendant.

Accordingly, because no Opposition was filed, Defendant will not be filing a Reply. Therefore, for the reasons stated above, Defendant respectfully requests that the Court recognize that the Motion to Dismiss is unopposed and issue a decision granting the Motion.

Thank you in advance for Your Honor's consideration.

Respectfully yours,



Aaron Twersky, Esq.

cc: All Counsel (via ECF)